

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ESTHER WILDER,

Plaintiff,

– against –

SARAH HOILAND.,

Defendant.

Case No. 1:22-cv-01254-PKC

**DECLARATION OF GUY
COHEN**

1. **GUY COHEN** declares under penalty of perjury under the laws of the United States of America that the following is true and correct:

2. I am a partner in the firm Davis+Gilbert LLP (“Davis+Gilbert”), attorneys of record for Defendant in the above-captioned action (the “Action”). I submit this affirmation in support of Defendant’s Motion for Summary Judgment, and in opposition to Plaintiff’s Motion for Summary Judgment. The purpose of this affirmation is to include in the record of the motions certain documents produced in this Action.

3. Attached as Exhibit 1 is a true and correct copy of the publicly available NICHE Abstract.

4. Attached as Exhibit 2 is a true and correct copy of email correspondence dated June 5, 2020, produced by Esther Wilder, between Esther Wilder, Eugene Sohn, and Bridget Barbara, with the subject line “Formal Complaint Against Sarah Hoiland,” Bates numbered beginning P000588.

5. Attached as Exhibit 3 is a true and correct copy of a Copyright Notice, produced by Esther Wilder, Bates numbered beginning P000655.

6. Attached as Exhibit 4 is a true and correct copy of email correspondence dated March 12, 2020, produced by Sarah Hoiland, between Sarah Hoiland, John Tsapogas, Alan Kluger, and Felix Cardona, with subject line “Sarah Hoiland Case,” Bates numbered beginning P000572.

7. Attached as Exhibit 5 is a true and correct copy of a letter dated June 23, 2020, produced by Esther Wilder, Bates numbered beginning P000595.

8. Attached as Exhibit 6 is a true and correct copy of email correspondence dated September 10, 2020, produced by Esther Wilder, between Esther Wilder and Yoel Rodriguez, with the subject line “Re: Notification Research Misconduct Proceeding, Bates numbered beginning P000596.

Dated: New York, New York
April 18, 2023

/s/ Guy Cohen
Guy Cohen